

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**STEPHEN GRAY, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,**

Plaintiff,

-against-

**CITIGROUP INC., CHARLES PRINCE, THE
PLANS ADMINISTRATIVE COMMITTEE OF
CITIGROUP INC., THE 401(K) INVESTMENT
COMMITTEE, AND JOHN DOES 1-20,**

Defendants.

**Civil Action No.: 07 CIV 9790
(SHS) (DCF)**

**PLAINTIFF CHRIS SOUTHARD'S RESPONSE TO THE GRAY AND TADROS
PLAINTIFFS' MOTION FOR (1) CONSOLIDATION (2) APPOINTMENT OF LEAD
PLAINTIFFS AND LEADERSHIP STRUCTURE AND (3) ENTRY OF [PROPOSED]
PRETRIAL ORDER NO 1**

December 11, 2007, Plaintiff Chris Southard filed a complaint against Citigroup, Inc., and certain of its directors, officers, and employees, for violations of the Employee Retirement Income Security Act. See Southard v. Citigroup, Inc., et al., No. 07-11164 (SHS). Plaintiff Southard does not oppose the Motion of the Gray and Tadros Plaintiffs for consolidation, appointment of lead plaintiffs, and the appointment of Wolf Popper LLP and Harwood Feffer LLP as co-lead counsel to prosecute the consolidated ERISA action, see Gray v. Citigroup, Inc., et al., No. 07-cv-09790-SHS, Docket No. 3, filed on November 26, 2007, and joins in that Motion.

Dated: December 12, 2007

GAINNEY & McKENNA

S/

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New York, New York 10017
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Attorneys for Plaintiff Chris Southard

SHAUN ROSE, Individually and On Behalf of All
Others Similarly Situated,

Civil Action No: 07 Civ. 10294
(DC)

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF CITIGROUP
INC., THE 40 1(k) INVESTMENT COMMITTEE, and
JOHN DOES 1 - 10,

Defendants.

MEREDITH TRANBERG, individually and on behalf
of all others similarly situated,

Civil Action No: 07 Civ. 10341
(UA)

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF CITIGROUP
INC., THE 40 1(k) INVESTMENT COMMITTEE, and
JOHN DOES 1 - 20,

Defendants.

ANTON RAPPOLD, individually and on behalf of all
others similarly situated,

Civil Action No: 07 Civ. 10396
(UA)

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES
PRINCE, THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC., THE 40 1(k)
INVESTMENT COMMITTEE, and JOHN and JANE
DOES 1 - 10,

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Civil Action No: 07 Civ. 10442
(CIA)

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE, C.
MICHAEL ARMSTRONG, ALAIN J.P. BELDA,
GEORGE DAVID, KENNETH T. DERR, JOHN M.
DEUTCH, ROBERTO HERNANDEZ RAMIREZ,
ANN
DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW
N. L1VERJS, ANNE M[JLCAHY, RICHARD D.
PARSONS, JUDITH RODIN, ROBERT E. RUBIN,
ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN
DOES 1-20 (BEING CURRENT AND FORMER
MEMBERS OF THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC.) and JOHN DOES
21-40 (BEING CURRENT AND FORMER MEMBERS
OF THE INVESTMENT COMMITTEE OF THE
CITIGROUP INC. 401(K) PLAN),

Defendants.

STEPHAN FIORINO, individually and on behalf of all
others similarly situated,

Civil Action No: 07 Civ. 10458
(SHS)

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES
PRINCE, THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC., THE 401(k)
INVESTMENT COMMITTEE, and JOHN DOES 1 -
20,

Defendants.

JAMES BOLLA, individually and on behalf of all others similarly situated,

Civil Action No: 07 Civ. 10472
(UA)

Plaintiff,

v.

CITIGROUP INC., CITIBANKN.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly,

Civil Action No; 07 Civ. 10461
(UA)

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 40 1(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, SANFORD I. WEILL,

Defendants.

CHRIS SOUTHARD, ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Civil Action No.: 07-CV-11164
(SHS)

Plaintiff,

-against-

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) AND JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN,

Defendants.
